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TN REGULATORY AUTHORITY
DOCKET ROOM

August 27, 2002

Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Broadband Innovations, LLC
Docket No. 02-00819

Dear Sir:

Enclosed for filing with the Regulatory Authority, please find an original and thirteen (13) copies of the above captioned corporation's Objection to Petition to Intervene.

Should you have any questions concerning this filing, please contact me.

Yours truly,

EARLY, LENNON, CROCKER & BARTOSIEWICZ, P.L.C.

Patrick D. Crocker

PDC/tlb

cc: Richard Graves

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In re:

Broadband Innovations, LLC Application
for a Certificate to Provide Local
Telecommunications Services within the
State of Tennessee

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Docket No. 02-00819

OBJECTION TO PETITION TO INTERVENE

Broadband Innovations, LLC, ("Broadband"), objects to the Petition to Intervene as a matter of right filed by Aeneas Internet Services, LLC, ("Aeneas"), for the following reasons:

1. The Petition does not state facts demonstrating that the legal rights, duties, privileges, immunities or other legal interest of Aeneas may be determined in this proceeding, nor does Aeneas qualify as an intervener under any provision of law, as is required by TCA 4-5-310(b), to intervene as a matter of right.
2. The allegation that Broadband is not a stand alone carrier is false and no agreement exists between Broadband and Jackson Energy Authority.
3. If Broadband and Jackson Energy Authority do enter into an agreement to provide telecommunication services the contract will not become effective or enforceable until the Tennessee Regulatory Authority has approved the same on petition, and after notice and opportunity to be heard has been extended to interested parties as provided by TCA 7-52-103 (9)(d). The issues sought to be raised in the present petition by Aeneas may be raised in a proceeding to approve an agreement between Broadband and Jackson Energy Authority if the parties do enter into such agreement, but the issues are not pertinent to this proceeding and are premature.
4. If the Petition to Intervene is granted it will impair the orderly and prompt conduct of this proceeding since it is apparent that Aeneas wishes to raise issues which are not relevant to this proceeding and which may be properly addressed in another proceeding.

Broadband, therefore requests that the Petition to Intervene be denied.

Respectfully submitted,

EARLY, LENNON, CROCKER & BARTOSIEWICZ, PLC
Attorneys for Broadband

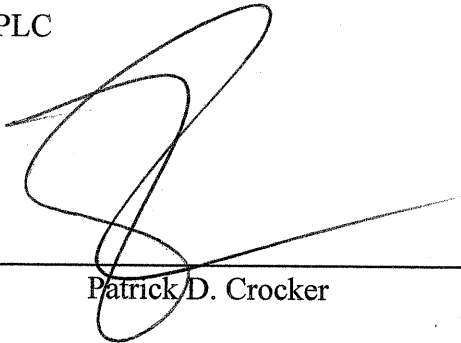
By

Patrick D. Crocker
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows on this 27th day of August, 2002:

Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
P.O. Box 198062
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Patrick D. Crocker